



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

March 3, 2021

Brian Conners
Operations Lead, East
Chevron Environmental Management Company
1200 State Street
Perth Amboy, New Jersey 08861

Re: Response to USEPA Comments, dated July 26, 2019
Monitored Natural Attenuation Implementation Work Plan (IWP), dated September 28, 2018
Former Chevron Perth Amboy Facility
Perth Amboy, Middlesex County, New Jersey
EPA ID #: NJD081982902

Dear Mr. Conners:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Response to USEPA Comments, dated July 26, 2019 regarding Chevron's submittal of the Monitored Natural Attenuation IWP, dated September 28, 2018, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. These workplans were submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E. We hereby conditionally approve the above documents pending that the following items be addressed, effective the date of this letter:

General Comment:

We concur with the plan that focuses the MNA assessment on benzene as the principal COC in recognition that:

- 1) where additional COCs in ground water are present in ground water, any future NFA request will include a complete review of ground water data and data trends with remedial actions performed to evaluate all COCs that exceed a Class IIA GWQS and/or are a concern with respect to any ground water receptor (ground water use, vapor intrusion and/or surface water/ecological receptors; and
- 2) Remedial actions and data will be reviewed for compliance with both the HSWA permit provisions and NJ State regulations.

MNA IWP data may need to be evaluated in conjunction with other data sets collected through site-wide and specific SWMU-AOC-PAOC and LNAPL remedial action documents. SWMU-AOC-PAOC and LNAPL remedial investigation and remedial action documents also include pre-remediation temporary well locations and data not included in the Appendix A historic data summaries.

Specific Comments:

1. In future MNA IWP document submittals, update Figures (all site wells are not located on MNA IWP Figures – see 3rd Quarter Progress Report well location figure), and update Appendix A and B historic data summary tables (to keep data tables current).
2. Modify MNA IWP Table 1 to include 1,4-dioxane and Tert-Butyl Alcohol (TBA) or explain why they are not included.
3. Verify that 1,4-dioxane has been analyzed at, at a minimum, CVOC impacted AOC 22-AOC 36 areas. It was not included as a parameter under VOC or SVOC analyses in Appendix A1 through A6.
4. Modify Appendix C1 Scope of Work for MNA IWP Table and Appendix C2 Well Construction Summary Table (WCST) to include the following deep wells unless included in another monitoring program:

AOC 22-36: MW-532 (MW-531 was listed twice in the comment/response in error);

AOC 31: MW-293R (historic data in Appendix A);

SWMU 10: MW-246R (historic data in Appendix A); and

SWMU 35-AOC 6A: MW-403R (historic data in Appendix A)

5. Appendix C1 Scope of Work for MNA includes a note “N”. This identifies SVOCs are not included in MNA IWP analyses since SVOCs were not identified since 2017. Ensure that **not** including SVOC analysis at a well is based on more than one round of data through 2017 or perform confirmation sampling as necessary within the MNA IWP scope of work.
6. In a future MNA IWP document submittal, include deep well data summary figures like shallow aquifer Figures 9 and 10 to illustrate deep well impact areas (historic and current). Impacts may be limited to a few SWMU-AOCs, e.g., SWMU 35-AOC 6A, SWMU 10, AOC 31, AOC 9A (clarify if MW-180 was replaced as part of AOC 9A ISCO soil mixing?), AOC 22-AOC 36, etc.
7. Clarify the data discussion regarding deep ground water MW-333 in Response 2. The well location figure does not identify MW-333 as a deep well, and the well was abandoned in 2017.
8. The Appendix C2 WCST does not include all wells at the facility. A complete site WCST is requested, including abandoned wells, for a compilation of site well construction and aquifer interval information in one place.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at vargas.ricardito@epa.gov.

Sincerely,



Ricardito Vargas
Project Manager
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)